

| UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY | |
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| Caption in Compliance with D.N.J. LBR 9004-2(c) | |
| WASSERMAN, JURISTA & STOLZ, P.C. | |
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| P.O. Box 1029 | |
| Millburn, New Jersey 07041 | |
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| Counsel to Debtor | |
| In Re: | Case No.: 14-34500 DHS |
| 16 RIVER ROAD HOLDINGS, LLC, | Chapter 7 |
| Debtor(s). | Judge: Donald H. Steckroth |
| | Hearing Date: February 3, 2015 at 10:00 a.m. |

NOTICE OF MOTION FOR AN ORDER AUTHORIZING THE SALE OF DEBTOR'S REAL PROPERTY, COMMONLY KNOWN AS 16 RIVER ROAD, CHATHAM, NEW JERSEY FREE AND CLEAR OF ALL LIENS, CLAIMS AND ENCUMBRANCES PURSUANT TO 11 U.S.C. §363(b) AND (f), AND WAIVING AUTOMATIC STAY UNDER F.R.B.P. 6004(d) and 6006(d)

TO: ALL ATTORNEYS ON ANNEXED SERVICE LIST

ALL OF THE DEBTOR'S CREDITORS ON ANNEXED SERVICE LIST

PLEASE TAKE NOTICE that on the 3rd day of February, 2015 at 10:00 a.m. or as soon thereafter as counsel may be heard, the undersigned, as counsel for 16 River Road Holdings, LLC ("Debtor"), shall move before the Honorable Donald H. Steckroth, United States Bankruptcy Court, U.S. Courthouse, 50 Walnut Street, PO Box 1352, Newark, New Jersey 07102 for the entry of an Order authorizing the sale of Debtor's real property, commonly known as 16 River Road, Chatham, New Jersey free and clear of all liens, claims and encumbrances

pursuant to 11 U.S.C. §363(b) and (f), and waiving automatic stay under F.R.B.P. 6004(d) and 6006(d) together with such other and further relief as may be just and proper.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the motion submitted in support hereof, the exhibits annexed thereto, and the argument of counsel.

PLEASE TAKE FURTHER NOTICE that oral argument is requested. No brief or memorandum of law is submitted with the within motion as there are no complex issues of law involved. The applicable law is set forth within the annexed application.

PLEASE TAKE FURTHER NOTICE that all objections must be in writing, filed with the Clerk of the United States Bankruptcy Court, U.S. Courthouse, 50 Walnut Street, PO Box 1352, Newark, New Jersey 07102, and a copy thereof must simultaneously be served upon Wasserman, Jurista & Stolz, P.C., Attn: Leonard C. Walczyk, Esq., 225 Millburn Avenue, Suite 207, Millburn, New Jersey 07041 so that such objections are received no later than seven (7) days prior to the return date set forth hereinabove.

PLEASE TAKE FURTHER NOTICE, that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Respectfully submitted,

WASSERMAN, JURISTA & STOLZ, P.C.
Counsel for Debtor

/s/ LEONARD C. WALCZYK
LEONARD C. WALCZYK

DATED: January 12, 2015